

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor,

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of Bernard
L. Madoff,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-04330 (SMB)

**STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT TO ANSWER,
MOVE OR OTHERWISE RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and defendant Square One Fund Ltd. (the “Defendant”), by and through their undersigned counsel, that the time by which the Defendant may answer, move, or otherwise respond to the Trustee’s complaint (the “Complaint”) is extended up to and including September 26, 2018. Nothing in this Stipulation is a waiver of the right to request from the Court a further extension of time to answer, move, or otherwise respond and/or the Trustee’s right to object to such request.

Undersigned counsel for the Defendant represents that service of process of the summons and Complaint on the Defendant has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendant.

Except as expressly set forth herein, the parties to this Stipulation reserve all objections, rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such objections, rights and defenses, including without limitation challenges to personal jurisdiction, venue, or the jurisdiction of this Court or any other court. It is further understood that nothing herein shall constitute a waiver of any objections, rights, or defenses that any other defendant may have in this action.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

This Stipulation is entered into pursuant to the Order Granting Supplemental Authority
To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (Adv. Pro.
No. 08-01789, ECF No. 17560).

Dated: August 22, 2018
New York, New York

/s/ Marco Molina

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marco Molina
mmolina@bakerlaw.com
Andrew M. Serrao
aserrao@bakerlaw.com

*Attorneys for Irving H. Picard,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of
Bernard L. Madoff*

/s/ Emily Mathieu

Thompson Hine LLP
335 Madison Avenue
New York, New York 10017
Telephone: (212) 344-5680
Facsimile: (212) 344-6101
Barry M. Kazan
Email: Barry.Kazan@ThompsonHine.com
Emily Mathieu
Email: Emily.Mathieu@ThompsonHine.com

Attorneys for Square One Fund Ltd.

SO ORDERED this 22nd day of August, 2018.

/s/ STUART M. BERNSTEIN

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE